

States District Court for the District of Maryland and as grounds for said removal states as follows:

1. Plaintiff served her Summons and Complaint on Defendant Whitehead Enterprises, LLC, along with a set of Interrogatories and Request for Production of Documents on December 30, 2013. Copies of the Summons, Complaint, Civil Information Sheet, Interrogatories and Request for Production of Documents in this matter are attached hereto as Exhibits 1 – 5, respectively. Defendants Prakash Saraf (incorrectly identified as Prakash *Sarif*) and Vinodbhai Patel have not yet been served.
2. Thirty days have not elapsed since service of process and no other proceedings have occurred in this action.
3. The Complaint alleges violations of 42 U.S.C. § 1981 involving discrimination in the making or forming of contracts based on race.
4. This action seeks recovery pursuant to a federal statute, and is, therefore, a civil action of which this Court has original jurisdiction pursuant to 28 U.S.C. § 1331 and one which may be removed to this Court pursuant to 28 U.S.C. §§ 1441 and 1446 because of federal question jurisdiction.
5. The United States District Court for the District of Maryland is the District Court of the United States within which Plaintiff's state court action is currently pending.
6. Defendant has attached to this Notice as Exhibits 1-5 all process, pleadings and orders served upon Defendants in this action to date. No other proceedings have occurred in this action.

7. A notification of removal will be filed with the State Court promptly upon receipt from the U.S. District Court for District of Maryland of a date-stamped copy of this Notice of Removal.

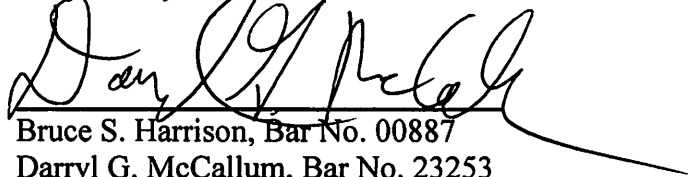
8. The undersigned counsel for Defendant Whitehead Enterprises, LLC, also represents Defendants Saraf and Patel. While they have not yet been served, Defendants Saraf and Patel consent to the removal of this case and join in this removal petition by virtue of the signature of counsel of record for all Defendants below.

CERTIFICATION OF COUNSEL

In accordance with Local Rule 103.5, counsel for Defendant certifies that Exhibits 1-3 attached hereto are copies of all papers currently on file in the State Court.

Date: January 24, 2014

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Darryl G. McCallum", is written over a horizontal line.

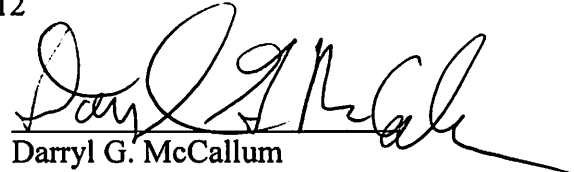
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice of Removal was served this 24th day of January, 2014 by United States mail, postage prepaid, upon the following counsel of record for Plaintiffs:

John B. Stolarz
The Stolarz Law Firm
6509 York Road
Baltimore, MD 21212


Darryl G. McCallum

#393908